# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

|                                  |          | ) |                         |
|----------------------------------|----------|---|-------------------------|
| In re:                           |          | ) | Chapter 11              |
|                                  |          | ) |                         |
| STRIKE, LLC, et al. <sup>1</sup> |          | ) | Case No. 21-90054 (DRJ) |
|                                  |          | ) |                         |
|                                  | Debtors. | ) | (Jointly Administered)  |
|                                  |          | ) |                         |

## AGENDA FOR HEARING ON SET ON JANUARY 3, 2022 AT 12:00 P.M. (PREVAILING CENTRAL TIME)

1. <u>DIP Motion</u>. Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 79]

### **Related Documents:**

- Objection to Interim Order (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 155]
- Aspen American Insurance Company's Objection to Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 303]

The Debtors in these chapter 11 cases, along with the last four digits of each Debtors' federal tax identification number, are: Strike, LLC (2120); Strike HoldCo, LLC (0607); Delta Directional Drilling, LLC (9896); Strike Global Holdings, LLC (4661); Capstone Infrastructure Services, LLC (0161); and Crossfire, LLC (7582). The location of Debtor Strike, LLC's principal place of business and the Debtors' service address is: 1800 Hughes Landing Boulevard, Suite 500, The Woodlands, Texas 77380. Additional information regarding this case may be obtained on the website of the Debtors' proposed claims and noticing agent at https://dm.epiq11.com/StrikeLLC.

- Limited Objection of Certain Texas Taxing Entities' to the Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 304];
- Objection of the Official Committee of Unsecured Creditors of Strike, LLC, et al. to the Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 306]
- Debtors' Omnibus Reply to Objections to the DIP Motion [Docket No. 332]
- Proposed Final Order (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 333]
- Reply of AIPCF VII LLC to Objection of Official Committee of Unsecured Creditors to Debtors DIP Motion [Docket No. 334]

<u>Status</u>: The Debtors also received informal responses from Chubb Insurance Companies, Mears Group, Inc. and Komatsu Financing Limited Partnership. These objections were resolved through inclusion of language in the proposed order filed at Docket No. 333. As to the remaining objections, this matter is going forward.

- 2. <u>Critical Vendor Motion.</u> Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Critical Vendor Claims, Liens Claims, and 503(b)(9) Claims,. (II) Confirming Administrative Expense Priority of Outstanding Purchase Orders, and (III) Granting Related Relief [Docket No. 10].
  - Proposed Final Order (I) Authorizing the Payment of Critical Vendor Claims, Liens Claims, and 503(b)(9) Claims, (II) Confirming Administrative Expense Priority of Outstanding Purchase Orders, and (III) Granting Related Relief [Docket No. 329]

Status: This matter is going forward.

3. <u>Bar Date Motion</u>. Motion for Entry of an Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, and (IV) Approving Notice of Bar Dates [Docket No. 21].

**Status**: The Debtors filed a Certificate of No Objection [Docket No. 337].

Houston, Texas January 3, 2022

#### /s/ Matthew D. Cavenaugh

#### JACKSON WALKER LLP

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# **Certificate of Service**

I certify that on January 3, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavenaugh
Matthew D. Cavenaugh